

Kelly H. Dove
Nevada Bar No. 10569
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway
Suite 1100
Las Vegas, Nevada 89169
Telephone: 702.784.5200
Facsimile: 702.784.5252
Email: kdove@swlaw.com

Attorneys for Defendant Wells Fargo Bank, N.A.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAELA CHRISTIAN,

Plaintiffs,

vs.

WELLS FARGO BANK, N.A.,

Defendant.

Case No. 2:21-cv-01419-APG-EJY

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

(First Request)

Plaintiff Michaela Christian (“Plaintiff”) and Wells Fargo Bank, N.A. (“Wells Fargo” and together with Plaintiff, the “Parties”), by and through their respective counsel, hereby stipulate and agree to extend Wells Fargo’s deadline to respond to Plaintiff’s Complaint [ECF No. 1] to September 27, 2021, for the following reasons:

1. Plaintiff served the Complaint and Summons on Wells Fargo on or about August 5, 2021, making Wells Fargo’s Answer currently due August 26, 2021.

2. Undersigned counsel was just retained on August 27, 2021, and along with Wells Fargo, requires additional time to investigate the allegations set forth in the Complaint and to prepare the appropriate response. Wells Fargo therefore requests an additional thirty (30) days to respond to Plaintiff’s Complaint.

3. On August 28, 2021, counsel for Plaintiff agreed to the extension requested herein.

4. This extension request is sought in good faith and is not made for the purpose of delay.

Therefore, the Parties respectfully request an extension for Wells Fargo to respond to Plaintiff's Complaint to and including September 27, 2021.

Dated September 8, 2021

Dated September 8, 2021

FREEDOM LAW FIRM

SNELL & WILMER L.L.P.

By: /s/ George Haines

By: /s/ Kelly H. Dove

George Haines
Nevada Bar No. 9411
8985 S. Eastern Avenue, Suite 350
Las Vegas, Nevada 89123

Kelly H. Dove
Nevada Bar No. 10569
3883 Howard Hughes Parkway
Suite 1100
Las Vegas, Nevada 89169

Attorney for Plaintiff Michaela Christian

Attorneys for Defendant Wells Fargo Bank, N.A.

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: September 8, 2021

4850-4729-5993

Snell & Wilmer

L.L.P.
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200